

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF SETH
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am also Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Reply in Support of Their Joint Motion to Exclude the Opinions of Stephen Lagana, M.D.
2. Attached hereto as Exhibit A is a true and accurate copy of "Concise International Chemical Assessment Document 38: N-nitrosodimethylamine" by R.G. Liteplo et al.
3. Attached hereto as Exhibit B is a true and accurate copy of "Abrupt Increase in Reporting of Neoplasms Associated with Valsartan After Medication Recall" by S.G. Al-Kindi, et al.

4. Attached hereto as Exhibit C is a true and correct copy of “Questions and Answers on FDA’s Adverse Event Reporting System (FAERS)” published on FDA.gov and available at <https://www.fda.gov/drugs/surveillance/questions-and-answers-fdas-adverse-event-reporting-system-faers>.

5. Attached hereto as Exhibit D is a true and correct copy of “Endogenous versus exogenous exposure to N-nitroso compounds and gastric cancer risk in the European Prospective Investigation into Cancer and Nutrition (EPIC-EURGAST) study” by P. Jakszyn et al.

6. Attached hereto as Exhibit E is a true and correct copy of “Drinking Water as a Proportion of Total Human Exposure to Volatile N-Nitrosamines” by S.E. Hrudey, et al.

7. Attached hereto as Exhibit F is a true and correct copy of “Consumption of precursors of N-nitroso compounds and human gastric cancer” by N.W. Choi, et al.

8. Attached hereto as Exhibit G is a true and correct copy of “N-nitrosodiethylamine genotoxicity evaluation: a cytochrome P450 induction study in rat hepatocytes” by C.A.F. Aiub, et al.

9. Attached hereto as Exhibit H is a true and correct copy of “The production of malignant primary hepatic tumours in the rat by feeding dimethylnitrosamine” by P.N. Magee, et al.

10. Attached hereto as Exhibit I is a true and correct copy of “Chemical Carcinogenesis Studies in Nonhuman Primates” by R.H. Adamson, et al.

11. Attached hereto as Exhibit J is a true and correct copy of “Tumor incidence in a chemical carcinogenesis study of nonhuman primates” by U.P. Thorgeirsson, et al.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel*
for Defendants

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Dated: January 6, 2022

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